

1 WILLIAM B. TERRY, ESQ.
2 Nevada State Bar No. 001028
3 ALEXANDRA ATHMANN-MARCOUX, ESQ.
4 Nevada Bar No. 014474
5 WILLIAM B. TERRY CHARTERED
6 530 South Seventh Street
7 Las Vegas, Nevada 89101
(702) 385-0799
(702) 385-9788 (Fax)
Info@WilliamTerryLaw.com
Attorney for Defendant

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA)
11 Plaintiff,) CASE NO.: 2:19-mj-00670-EJY
12 vs.)
13 ROBERT CASAGRANDE,)
14 Defendant.)

15 **STIPULATION REQUESTING CASE BE CLOSED PURSUANT TO**
16 **NOTICE OF COMPLIANCE (ECF 15)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Rachel L. Kent, Special
18 Assistant U.S. Attorney, counsel for Plaintiff, United States of America, and William B. Terry, Esq.,
19 of the law offices of William B. Terry, Chartered, counsel for Defendant, Robert Casagrande, as
20 follows:

21 IT IS FURTHER HEREBY STIPULATED AND AGREED, the counsel for the defendant
22 filed a Notice of Compliance (ECF 15) showing the Defendant completed the DUI School and the
23 Victim Impact Panel as well as the community service as required;

24 IT IS FURTHER STIPULATED AND AGREED, that the defendant paid the \$500.00 fine
25 and submitted the payment for the \$10.00 assessment fee;

26 IT IS FURTHER STIPULATED AND AGREED, that should the defendant complete all
27 the obligations imposed by the Court within six (6) months of the change of plea hearing, the parties
28 agree to jointly move to allow the defendant to withdraw his plea of guilty to Count 1 Reckless
Driving;

WILLIAM B. TERRY, CHARTERED
530 South Seventh Street
Las Vegas, Nevada 89101
(702) 385-0799

1 IT IS FURTHER STIPULATED AND AGREED, the Government will move to amend
2 Count 1 of the Complaint to a charge of Unsafe Operation, a violation of 36 C.F.R. § 4.22(b)(1).
3 The defendant will plead guilty to the Amended Count 1 of the Complaint;

4 IT IS FURTHER STIPULATED AND AGREED, that the parties request that the original
5 sentence be applied to the Unsafe Operation conviction.

6 DATED this 2nd day of June, 2020.

7 UNITED STATES ATTORNEY

9 /s/ Rachel Kent
10 RACHEL L. KENT
Special Assistant United States Attorney
District of Nevada
11 501 Las Vegas Boulevard S., Ste. 1100
Las Vegas, Nevada 89101
(702) 388-6336
12 Attorney for Plaintiff
(702) 388-6336

WILLIAM B. TERRY CHARTERED

9 /s/ William Terry
10 WILLIAM B. TERRY, ESQ.
Nevada Bar No. 001028
11 ALEXANDRA ATHMANN-MARCOUX, ESQ.
Nevada Bar No. 014474
12 WILLIAM B. TERRY, CHARTERED
530 South Seventh Street
(702) 385-0799
13 Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

CASE NO.: 2:19-mj-00670-EJY

VS.

ROBERT CASAGRANDE,

Defendant.

FINDINGS

1. That counsel for the defendant filed a Notice of Compliance (ECF 15) showing the Defendant completed the DUI School and the Victim Impact Panel as well as the community service as required;
 2. That the defendant paid the \$500.00 fine and submitted the payment for the \$10.00 assessment fee;
 3. That the parties agree that the defendant completed all the obligations imposed by the Court within six (6) months of the change of plea hearing, the parties agree to jointly move to allow the defendant to withdraw his plea of guilty to Count 1 Reckless Driving;
 4. That the Government will move to amend Count 1 of the Complaint to a charge of Unsafe Operation, a violation of 36 C.F.R. § 4.22(b)(1). The defendant will plead guilty to the Amended Count 1 of the Complaint;

ORDER

IT IS HEREBY ORDERED that the original sentence be applied to the Unsafe Operation conviction.

IT IS FURTHER HEREBY ORDERED that the case be closed and the June 16, 2020 date vacated.

DATED this 2nd day of June, 2020.

Layna J. Zanchah
UNITED STATES MAGISTRATE JUDGE